

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 08 CR 276
v.)	The Honorable Blanche M. Manning,
)	Judge Presiding
WILLIAM COZZI,)	
)	
)	
Defendant.)	

MOTION FOR EXTENSION OF TIME TO FILE PRE-TRIAL MOTIONS

Defendant, WILLIAM COZZI, by and through his attorney, TERENCE P. GILLESPIE, hereby moves this Honorable Court to grant him an extension of time to file pre-trial motions in this cause. In support of his motion, the following is offered:

1. The defendant stands accused by indictment of the offense of deprivation of rights under the color of law, pursuant to Title 18 United States Code, Section 242.
2. This Honorable Court ordered the defendant's pre-trial motions to be filed by April 28, 2008, with the Government's responses due on May 12, 2008, and any replies by the defendant due by May 26, 2008.
3. The Government has tendered discovery, including documents, as well as video and audio recordings, and photographs.
4. In light of the discovery tendered thus far by the Government, the defendant now seeks additional time so his attorneys may thoroughly review those materials and, in turn, to prepare any and all pre-trial motions necessary in his case.
5. Assistant United States Attorney Scott R. Drury was notified of defendant's intention

to seek additional time to file his pre-trial motions. AUSA Drury has no objection to the motion so long as the United States Attorney's Office is afforded the same amount of time to respond to defendant's motions as was contemplated by the original scheduling order.

WHEREFORE, Defendant, WILLIAM COZZI, respectfully requests that this Honorable Court enter an order granting him an extension of time to file his pre-trial motions to and including May 16, 2008.

Respectfully submitted,

/s/ Terence P. Gillespie
TERENCE P. GILLESPIE
Attorney for Defendant, William Cozzi

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CERTIFICATE OF SERVICE

I hereby certify Defendant's foregoing Motion for Extension of Time to File Pre-Trial Motions was served on April 23, 2008, in accordance with Fed.R.Crim.P. 49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the District Court's system as to ECF Filers.

/s/ Terence P. Gillespie
TERENCE P. GILLESPIE
Attorney for Defendant, William Cozzi

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